

BARAFF, KOERNER & OLENDER, P.C.

ATTORNEYS AT LAW

THREE BETHESDA METRO CENTER, SUITE 640

BETHESDA, MARYLAND 20814-5392

DC (202) 686-3200

MD (301) 986-0500

FAX (301) 986-4844

ROBERT L. OLENDER*
JAMES A. KOERNER

July 1, 1996

OF COUNSEL
B. JAY BARAFF*
ROBERT BENNETT LUBIC*

*NOT ADMITTED IN MD

DOCKET FILE COPY ORIGINAL

RECEIVED

JUL 1 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

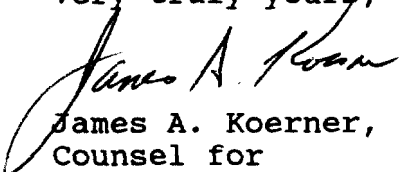
Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

Dear Mr. Caton:

On behalf of Goodrich Radio Marketing, Inc., licensee of Radio Station WSNX, Muskegon, Michigan, there are transmitted herewith an original and four copies of a Petition for Rule Making, looking toward amendment of Section 73.202(b) of the Rules to reallocate FM Channel 283B from Muskegon to Coopersville, Michigan and to modify the WSNX license accordingly.

Should additional information be necessary in connection with this matter, please communicate with this office.

Very truly yours,


James A. Koerner,
Counsel for
Goodrich Radio Marketing, Inc.

cc: Mr. Robert Emmett Goodrich

24905

No. of Copies rec'd
LH 1006

025
MMB

RECEIVED
JUL 1 1996

**Before the
Federal Communications Commission
Washington, D.C. 20554**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b),) RM _____
Table of Allotments,)
FM Broadcast Stations,)
(Muskegon and Coopersville, Michigan)

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

PETITION FOR RULE MAKING

Goodrich Radio Marketing, Inc. ("Goodrich"), licensee of Radio Station WSNX (FM), Muskegon, Michigan, by its attorneys, hereby respectfully requests that the Commission initiate a rule making proceeding looking toward the re-allotment of FM Channel 283B from Muskegon, Michigan to Coopersville, Michigan, and the modification of the WSNX license to specify Coopersville as the community of license. In support of this request, the following is submitted.

This petition is filed pursuant to the provisions of Section 1.420(i) of the Rules, which permits the reallocation of a channel from one community to another, and the modification of a station's authorization without competition from other applicants for the newly allotted channel. See Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), recon. granted in part, 5 FCC Rcd 7094 (1990). As demonstrated herein, the reallocation requested would result in a preferential arrangement of allotments.

In the FM service, the priorities are (1) first aural service, (2) second aural service, (3) first local service, and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3). Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 92 (1982). The proposal espoused herein would satisfy priority (3), in that it would provide a first local service to Coopersville, Michigan without depriving Muskegon of either its first or second aural service.

Coopersville (1990 population 3,421) is located in Ottawa County, Michigan (1990 population 187,768). The community is located northwest of Grand Rapids and southeast of Muskegon, nearly mid-way between them. It is an incorporated community, with its own post office, and, thus, eligible for its own FM allotment.

Muskegon (1990 population 40,283) is presently served by three (3) AM stations and three (3) FM stations. Thus, removal of one (1) FM allotment will not deprive that community of its last aural, or even in its last commercial FM service. It will remain well served.

The map attached hereto demonstrates that, without any move of the WSNX transmitter site, or any other technical changes, city-grade service will be provided to all of Coopersville. It is obvious that the present WSNX site also suffices as an allotment site since WSNX operated non-directional, with full facilities.

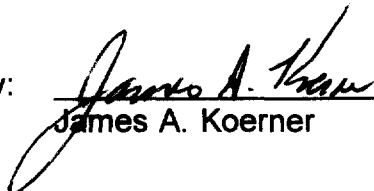
If this proposed reallocation is granted, Goodrich intends to file the requisite application to effectuate the change in community of license, and to operate Station WSNX as a Coopersville station. No actual construction will be necessary.

Accordingly, it is respectfully requested that the FM Table of Allotments be amended to read as follows

| | <u>Present</u> | <u>Proposed</u> |
|------------------------|--------------------|-----------------|
| Coopersville, Michigan | --- | 283 B |
| Muskegon, Michigan | 283B, 295 B, 30041 | 295B, 300B1 |

Respectfully submitted,

GOODRICH RADIO MARKETING, INC.

By: 
James A. Koerner

Baraff, Koerner & Olender, P.C.
3 Bethesda Metro Center, Suite 640
Bethesda, Maryland 20814-5330

MAP INDEX

- 1 - WSPN (AM), Muskegon, MI
- 2 - WSNX-FM, Muskegon, MI
- 3 - WODJ, Greenville, MI
- 4 - WGEN-FM, Grand Haven, MI
- 5 - WBCT, Grand Rapids, MI
- 6 - WKLO, Holland, MI
- 7 - WKBZ-FM, Whitehall, MI
- 8 - WLNT, Grand Rapids, MI
- 9 - WKEZ, Holland, MI
- 10 - WLAV-FM, Grand Rapids, MI
- 11 - WPEK-FM, Whitehall, MI
- 12 - WGRD-FM, Grand Rapids, MI
- 13 - WLCS, North Muskegon, MI
- 14 - WFOR, Grand Rapids, MI
- 15 - WJOK, Zeeland, MI
- 16 - WSNH-FM, Fremont, MI
- 17 - WCUZ-FM, Grand Rapids, MI
- 18 - WMR, Muskegon, MI
- 19 - WFUR-FM, Grand Rapids, MI
- 20 - WCXT, Hart, MI
- 21 - WOOD-FM, Grand Rapids, MI
- 22 - WMUS-FM, Muskegon, MI
- 23 - WMEG-FM, Muskegon, MI

 - Outlines Radio Market Area

